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14 Attorneys for Plaintiff
15 KARL E. RISINGER, and those similarly situated

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18
19 KARL E. RISINGER, an individual, on
behalf of himself and all others similarly
20 situated,

21 Plaintiff,

22 vs.

23 SOC LLC, a Delaware limited liability
company registered and doing business in
24 Nevada as SOC NEVADA LLC; SOC-SMG,
INC., a Nevada corporation; DAY &
25 ZIMMERMAN, INC., a Maryland
corporation; and DOES 1-20, inclusive,

26 Defendants.
27

Case No.: 2:12-cv-00063-MMD-PAL

**STIPULATION AND [PROPOSED]
ORDER EXTENDING CASE
DEADLINES
(First Request)**

1 WHEREAS, on December 11, 2018, the Court ordered Plaintiff Karl E. Risinger
2 (“Plaintiff”) and Defendants SOC LLC, SOC-SMG, Inc., and Day & Zimmermann, Inc. (together,
3 “Defendants”, and jointly with Plaintiff, the “Parties”) to file a Joint Pretrial Order on April 2,
4 2019;

5 WHEREAS, key members of Plaintiff’s trial counsel team are in trial in another matter
6 from March 11, 2019, through March 29, 2019, and thus Plaintiff requests additional time to
7 prepare the Pretrial Order, which is due on April 2, 2019, only two court days from the scheduled
8 completion of said trial;

9 WHEREAS, on March 14, 2019, Defendants filed a Motion for Leave to File a
10 Supplemental Memorandum in Support of Defendants’ Motion for Reconsideration
11 (“Supplemental Motion for Reconsideration”) (ECF No. 337), and the deadline for Plaintiff to
12 oppose Defendants’ Supplemental Motion for Reconsideration is March 28, 2019;

13 WHEREAS, Plaintiff wishes to extend the deadlines for the Joint Pretrial Order and
14 Plaintiff’s Opposition to Defendants’ Supplemental Motion for Reconsideration;

15 WHEREAS, Defendant does not oppose these requests.

16 WHEREAS, these requests will not prejudice the overall schedule as the Court has not yet
17 set a trial date;

18 NOW THEREFORE, the parties hereby stipulate and agree to the following:

19 MOTION SCHEDULE

20 1. The deadline for Plaintiff’s Opposition to Defendants Supplemental Motion for
21 Reconsideration shall be extended to April 11, 2019.

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1 TRIAL DEADLINES

2 2. The deadline for the parties' Joint Pretrial order shall be extended to April 23, 2019.

3
4 Dated: March 20, 2019

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

5
6 By: /s/ Devin A. McRae
7 SCOTT E. GIZER
8 DEVIN A. MCRAE
9 Attorneys for Plaintiff

10 Dated: March 20, 2019

QUINN EMANUEL URQUHART & SULLIVAN
LLP

11 By: /s/ Tara Lee
12 TARA LEE
13 KEITH FORST
14 DANIEL MACH
15 Attorneys for Defendants

16 **IT IS SO ORDERED.**

17 Dated this 22nd day of March, 2019

18 
19 UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I caused the following document(s) to be served to the persons listed below via the Court's Case
3 Management and Electronic Case Filing (CM/ECF) system:

4 **STIPULATION AND [PROPOSED] ORDER EXTENDING CASE DEADLINES**
5 **(First Request)**

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I declare under penalty of perjury that the foregoing is true and correct.

DATED this 20th day of March 20, 2019.

/s/ Esther Silverman

Esther Silverman